

Manning, Judy [IDPH]

From: Midwest Acupuncture Clinic <midwestacupuncture@gmail.com>
Sent: Friday, October 23, 2015 1:56 PM
To: Manning, Judy [IDPH]
Subject: Response to PTOT Position on Dry Needling Acupuncture

Hello Judith,

I would like to submit my response to the board. If you would be so kind to confirm that you have received my letter, I would greatly appreciate it. Also, I will be bringing public response forms from our community to your office on Monday. Is there a time that is better for you to personally receive them?

Thanks for your help.

Jay Heaverlo, M.S., L.Ac
Midwest Acupuncture Clinic
IAOMA Board Member

Personal response on PT Dry Needling Acupuncture for PTOT board:

Dear PTOT Board,

I have been studying and practicing Acupuncture and Chinese Medicine for more than 12 years. I have annually studied in China with some of China's most celebrated doctors for most of those years. Furthermore, I have 13 years of advanced Chinese language studies. This has allowed me to access more than 2,500 years of Chinese medical writings and research. I have translated many modern Chinese Medicine medical journal articles, as well as classical texts written by the great, master physicians of the past 2,000 years. This dedication to my education and the understanding of this medicine has given me great insight into how to best clinically apply the medicine and treat a multitude of conditions.

There is no other way to state my disappointment with the current practices of "dry needling" acupuncture by Iowa's physical therapy profession, than to say I strongly feel it is **unethical, unsafe, and illegal**. Dry needling is acupuncture. If we simply look at the procedure itself we can see how obvious that statement is.

The steps of dry needling are:

Step 1. Take an ACUPUNCTURE NEEDLE (it states right on the box that it is an acupuncture needle).

An acupuncture needle is not a mere tool. It is a class 2 medical device as defined by the FDA, which by state and federal law can only be used by licensed practitioners that are legally able to perform acupuncture. In the state of Iowa that is; licensed acupuncturists, MD's, DO's, chiropractors, dentists, and podiatrist. Physical therapists are not legally allowed to do acupuncture in the state of Iowa or even use an acupuncture needle.

Step 2. Insert the acupuncture needle into the trigger point (aka. acupuncture point or a-shi point)

By definition all trigger points are acupuncture points (but not all acupuncture points are trigger points). There are more points on the body than just the classical acupuncture points. Any point on the body can be considered an acupuncture point or an A-shi point (tender location on the body that may or may not refer pain to a different location). Therefore, by definition, all trigger points are acupuncture points. This theory dates back more than 2000 years. In addition, "dry needling" acupuncture is an invasive procedure, not a manual technique. It should only be practiced by trained and licensed practitioners who are legally authorized to perform invasive medical procedures.

At this point, the combination of steps 1 and 2 are already considered acupuncture. If the practitioner is not licensed to perform acupuncture, they have committed a violation of state law.

Step 3. Perform a technique to induce a muscle reaction.

This technique is what physical therapists claim makes dry needling different from acupuncture. However, as we see from the previous 2 steps acupuncture has already been performed. Furthermore, the technique that is performed is not a recent discovery. It is a technique that has been used for more than 2000 years by practitioners of Oriental medicine and recorded in the “Yellow Emperor’s Book of Internal Medicine” in 220 B.C. This technique is referred to as "lifting and thrusting". The intention is the exact same as dry needling acupuncture. Dry needling is not a new discovery but yet a new way of defining an ancient technique.

From this we can see clearly that **DRY NEEDLING IS ACUPUNCTURE**. An acupuncture needle is being inserted into an acupuncture point. There is no other way to interpret this. Regardless of which technique is performed (such as lifting and thrusting) after the needle has penetrated the body, acupuncture has already been performed. It is that simple!! If the board votes to include dry needling acupuncture into their scope of practice they will be in direct violation of state acupuncture laws. I think it will be extremely difficult to convince a judge otherwise. They will be held legally accountable for all injuries and violations that will occur by unlicensed therapists performing “dry needling” acupuncture.

The argument has been made that “dry needling cannot be acupuncture because the therapist is not utilizing Oriental Medicine principles in their treatment.” There are 3 ways to respond to this:

First, we can clearly see from steps 1 and 2 from the above example that acupuncture has been administered when taking an acupuncture needle and inserting it into the body. Regardless of what theory is used, it is still acupuncture. It is an invasive technique, not a manual technique. It should not be practiced by therapists who are not authorized to perform invasive procedures, ie; physical therapists and athletic trainers.

Secondly, ignorance is not a defense. Just because one is ignorant of Oriental Medicine principles does not mean they are not performing them. If a therapist performs surgical procedure but claims to have not used modern surgical theory or

principles, are they performing surgery or not? Of course they are. No matter what theory they claim to have used, it is still legally considered surgery. Acupuncture is the same. No matter what theory you claim you are using it is still legally considered acupuncture.

Third, the definition of dry needling is not a new discovery but rather a redefining of a preexisting technique. You cannot perform the same medical procedure and re-brand it to circumvent existing state laws. This is unethical and illegal. This is precisely what the Physical Therapy community is attempting to do with "dry needling" acupuncture.

As a practitioner of Acupuncture and Oriental Medicine, I see thousands of patients a year. I have traveled extensively throughout China, and studied in some of the largest hospitals, with some of the greatest, modern doctors of this medicine. I have seen the benefits of acupuncture over and over. It is truly one of the greatest achievements of medical sciences in the history of man. I can clearly understand why physical therapists would like to practice it. It is a great medicine. Unfortunately, I have also seen how damaging it can be when an untrained and unlicensed person uses an acupuncture needle, ie: punctured lungs, punctured kidneys, punctured cerebellum, damage to nerve and muscle tissues, etc. Even if the patient does not suffer physical injury by their untrained practitioner, they may suffer in other ways. Because of the lack of education the practitioner may "steal" the patients ability to have a proper treatment by a properly trained and licensed practitioner, thereby, delaying and even possibly preventing their recovery.

When it comes to "dry needling" acupuncture, it is merely one technique of needling that is utilized by a trained practitioner. There are dozens of possible techniques that may be utilized. Over the past 2500 years, doctors have been developing and refining these techniques. Frankly, "dry needling" acupuncture should be used very minimally, and in only certain conditions. This technique is too aggressive for most conditions and should be used very selectively. An insufficiently trained physical therapists does not know this. This is extremely unfortunate and dangerous for the patient!! It is best for physical therapists to refer patients to a properly trained and licensed acupuncturist if they feel their patient may benefit from "dry needling" acupuncture.

Myself, my patients and the Iowa community are greatly concerned when unlicensed, untrained therapists attempt to circumvent state acupuncture laws for their personal gain. If a physical therapist was truly concerned for their patients well-being they would refer their patients to a more qualified and trained practitioner. I don't see any logical way the Physical Therapy Board can vote to include "dry needling" acupuncture into their scope of practice and neither do the residents of Iowa. If they vote to include it, they are sending a message to the public that they truly do not care about their patients or the laws of Iowa. Furthermore, they will be in direct violation of existing state acupuncture laws. I implore you to make the correct decision for the safety and benefit of the residents of Iowa.

Thank you for your consideration.

Jay Heaverlo, M.S. L.Ac.

Midwest Acupuncture Clinic

Midwest Acupuncture Clinic
Jay Heaverlo, M.S., L.Ac.
2687 100th Street
Urbandale, IA 50322
(515) 554-6728
midwestacupuncture@gmail.com
www.midwestacupunctureclinic.com
Hours:
Tues-Thurs: 11am-7pm
Fri: 11am-3pm
Sat: 10am-3pm

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Manning, Judy [IDPH]

From: Linda Simonton <ljs8771@gmail.com>
Sent: Saturday, October 24, 2015 12:05 PM
To: Manning, Judy [IDPH]
Subject: Oppose "dry needling" by other than licensed acupuncturists

To: Iowa Board of Physical and Occupational Therpists

As a person who has benefitted greatly from acupuncture by a licensed acupuncturist, I am firmly opposed to allowing "dry needling" to be performed by other than licensed acupuncturists because of the strict educational and training requirements they must meet to be certified. As a consumer, I trust the Board to assure my safety by maintaining the highest possible standards and oversight.

Thank you.

Linda Simonton

Dry Needling

On 11 September 2015, a handful of Iowa licensed acupuncturists attended the Iowa Board of Physical and Occupational Therapy's Meeting. On the agenda was time to discuss whether physical therapists should be able to perform a technique called Dry Needling. All of the acupuncturists in attendance spoke against PTs performing this invasive therapy, but physical therapists in attendance argued for the technique to be allowed. Following this meeting, the Iowa POT Board will allow public input on this matter *only until October 29*. Then they will deliberate and make a final decision in December. The Board published the following statement:

"Anyone from the public wishing to submit written comments or other documents may do so by mailing or delivering them to the [Iowa Physical and Occupational Therapy] Board office "Attn: Judy Manning" or by emailing them to Judith.manning@idph.iowa.gov.

All submissions must be received by October 29, 2015." The Board is located in the Lucas Building, at 321 E 12th St, Des Moines, IA.

Feel free to use this sheet to record your opinion on this public safety matter, so that your opinion may be submitted to the Board. You may also send letters or emails directly to the Board.

Please check any and all boxes for who you think should be able to use acupuncture needles:

Yes No

- Licensed Acupuncturists, 2500+ hours of training, Nationally Accredited Graduate Degrees.
- Doctors of Chiropractic, 100 hours of non-accredited, certified training.
- Physical Therapists, minimum 24 hours of training in Dry Needling.
- Athletic Trainers, minimum 24 hours of training in Dry Needling.
- Medical Doctors, with 0 to 300 hours of training.

Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Penny Splinter

OCT 23 2015

Date: 10-18-15

ATTN: JUDY MANNING
IOWA BOARD OF PHYSICAL AND OCCUPATIONAL THERAPY
321 E. 12TH STREET
DES MOINES IOWA 50319

RE: The practice of "dry needling" by physical therapists and other practitioners not sufficiently trained to practice acupuncture. It is my belief that "dry needling" is actually acupuncture using acupuncture needles and acupuncture points (ashi points)

Dear Ms. Manning and Board Members,

Twenty four hours of training is not acceptable for any occupation, especially dry needle practitioners. Acupuncturists go through thousands of hours of training. Physical therapists should leave needling to the licensed Acupuncturists.

Sincerely,

Jammy Flynn

OCT 23 2015

ATTN: Judy Manning
Iowa Board of Physical and Occupational Therapy
321 E. 12th Street
Des Moines IA 50319

To Whom It May Concern:

With my signature below, I verify that I have had “dry needling”—or, more properly speaking, a “lifting/thrusting” technique—performed by an acupuncturist.

Physical Therapists, Chiropractors, and other health professionals claim that “dry needling” or “intramuscular manual therapy” is a unique, Western-created manual therapy in which a fine filiform needle is used to release knotted muscle fibers. Because their use of this technique stems from a Western pain therapy known as “wet-needling,” these health professionals believe it is different from acupuncture.

In truth, the “trigger points” that are used in dry needling are the same as “ashi points,” and have been used in acupuncture for many centuries. Although not every acupuncture treatment utilizes these ashi points or the lifting/thrusting technique, the fact remains that this method of treatment with an acupuncture needle has been a part of acupuncture training and practice for centuries.

My acupuncturist has used ashi points (“trigger points” or “dry needling”) during my treatments many times and I appreciate her expertise and advanced education. I am confident she has had the best training to perform this safely – and I would hope any practitioner who would perform this acupuncture would have the proper training.

Print name: Russell H Helbing

Signature: 

Date: 10-19-15

OCT 23 2015

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Iowa Board of Physical and Occupational Therapy
321 E. 12th Street
Des Moines IA 50319

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Print name: Susan Schumacher

Signature: SUSAN Schumacher

Date: 10-20-15

OCT 23 2015

ATTN: Judy Manning
Iowa Board of Physical and Occupational Therapy
321 E. 12th Street
Des Moines IA 50319

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Print name: Mindy Bassler

Signature: Mindy Bassler

Date: 10-20-2015

OCT 23 2015

Public Response Request:

Acupuncture/Dry Needling

On September 11, 2015, a handful of Iowa licensed acupuncturists attended the Iowa Board of Physical and Occupational Therapy's Meeting. On the agenda was time to discuss whether physical therapists should be allowed to perform an acupuncture technique they call Dry Needling. All of the acupuncturists in attendance spoke against PTs performing this invasive therapy, but physical therapists in attendance argued for the "Dry Needling" acupuncture technique to be allowed. Following this meeting, the Iowa POT Board will allow public input on this matter *only until October 29*. Then they will deliberate and make a final decision in December. The Board published the following statement:

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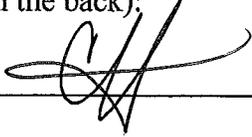
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Yes No

- Licensed Acupuncturists, 3,300+ hours of training (including 700-900 hours of supervised clinical internship), Nationally Accredited Graduate Degrees.
- Doctors of Chiropractic, 100 hours of non-accredited, certified training.
- Physical Therapists, minimum 24 hours of training in Dry Needling.
- Athletic Trainers, minimum 24 hours of training in Dry Needling.
- Medical Doctors, with 0 to 300 hours of training.

Please use the space below to further explain your opinion (more space on the back):

Your Name (required): CHRISTINE HENDERSHOT 

City/State/Zip AMES, IA 50010

(over)

"I only prefer to be treated by a licensed Acupuncturist, not only according to their education but also their experience in practicing acupuncture. Acupuncture has been extremely beneficial to me and I know it's because of Valerie's time and proven experience. She is extremely knowledgeable and therefore I trust her with my treatment. Acupuncture is not to be taken lightly."

- Christine Hendershot

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- Athletic Trainers, minimum 24 hours of training in Dry Needling.
- Medical Doctors, with 0 to 300 hours of training.

Please use the space below to further explain your opinion (more space on the back):

Your Name (required): Heidi Holmann / Heidi Holme
1018 Brookridge Ave Ames IA 50010

(over)

I think "truth in advertising" is at issue here -

Acupuncture should be done by trained + licensed professionals. 24 hours of training does not seem

to be adequate to be performing (and fully understanding) the therapeutic benefits of an ancient medical

activity. The training provided under a full education in this profession protects clients/patients from

charlatans and quackery. I suspect that cosmeticians - who only at hair - have more training hours than

24. ~~There is~~ ^{I believe} only licensed, trained acupuncturists

should be able to conduct this treatment.

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Athletic Trainers, minimum 24 hours of training in Dry Needling.

Medical Doctors, with 0 to 300 hours of training. — I wouldn't go to an M.D. to have a tooth extracted, either or a dentist to set a broken leg.

Please use the back of this page to further explain your opinion.

Print Your Name (required): Karen E. Craft Signature: Karen E. Craft

City/State/Zip code: Ames, IA 50010

(over)

Acupuncture is a highly refined skill, requiring many hours of study to master the complexities & concepts of traditional East Asian medicine on which it's based. Long-term clinical experience informs the Licensed Acupuncturist's choice of approach to a health problem.

"Dry needling" is the most basic form of acupuncture, & while it may provide temporary relief from pain, it does not address & correct the underlying causes of that pain. Quite possibly, dry needling can cause unintended complications in the long run.

I'm frankly disgusted by the websites of some physical therapists who claim "dry needling" is scientifically proven, implying that thousands of years of evidence-based research & results count for nothing. Research in acupuncture is ongoing, thus the requirements for continuing ed. for L.Ac.s.

I've had acupuncture treatments for many years for various health issues. I refuse to be treated by anyone less qualified than a Licensed Acupuncturist, not even a "Certified" acupuncturist, much less someone with limited training in "dry needling."

P.T. absolutely is called for in many situations - I witnessed the improved quality of life it gave my 95-year-old mother. But I strongly feel that over-simplified acupuncture is not in the scope of practice of a physical therapist.

Karen Craft

IMPORTANT PS -
ARE P.T.S BILLING DRY NEEDLING
AS PHYS. THERAPY ? THIS CONSTITUTES
INSURANCE FRAUD.

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Print Your Name (required): Ade Mae Lewis Signature: Ade Mae Lewis

City/State/Zip code: Des Moines, IA 50319

I've been treated with acupuncture for a number of years
for several health issues. I'd refuse to allow anyone
to perform such treatments if they did not meet the 3,300
hours of training as required for nationally accredited
Graduate Degrees.

Public Response Request:

Acupuncture/Dry Needling

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Print Your Name (required): Lesia Oesterreich Signature: 

City/State/Zip code: Ames IA 50010

Public Response Request:

Acupuncture/Dry Needling

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Print Your Name (required): Oliver Eulester Signature: 

City/State/Zip code: Ames, IA 50014

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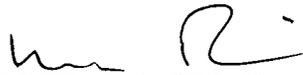
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Please use the back of this page to further explain your opinion.

Print Your Name (required): MARK FORBIS Signature: 

City/State/Zip code: AMES IA 50014

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Please check any and all boxes for who you think should be allowed to use acupuncture needles:

Yes No

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- Doctors of Chiropractic, 100 hours of non-accredited, certified training.
- Physical Therapists, minimum 24 hours of training in Dry Needling.
- Athletic Trainers, minimum 24 hours of training in Dry Needling.
- Medical Doctors, with 0 to 300 hours of training.

Please use the back of this page to further explain your opinion.

Print Your Name (required): Betty Baker Signature: Betty J Baker

City/State/Zip code: Des Moines Ia 50317

Public Response Request: Acupuncture/Dry Needling

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Print Your Name (required): Janet Johnson Signature: *Janet S. Johnson*

City/State/Zip code: Cedar Rapids IA 52403

Public Response Request:
Acupuncture/Dry Needling

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Print Your Name (required): Sandra Longhenry Signature: Sandra Longhenry

City/State/Zip code: Newada, IA 50201

OCT 23 2015

Public Response Request:

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Print Your Name (required): DARLENE SWEET Signature: *Darlene Sweet*

City/State/Zip code: Polk, Ia. 50236

OCT 23 2015

Public Response Request:

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Print Your Name (required): Cynthia Cambardeella Signature: CA Cambardeella

City/State/Zip code: Ames, IA 50010

Public Response Request:

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Print Your Name (required): GeAnna Clem Signature: GeAnna Clem

City/State/Zip code: Ames, IA 50010

Public Response Request:

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Please use the space below to further explain your opinion (more space on the back):

Your Name (required): Erin Bergquist

Nevada, IA 50201



Public Response Request:

Acupuncture/Dry Needling

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Print Your Name (required): Micki Nelson Signature: 

City/State/Zip code: AMES IA 50010

OCT 23 2015

Public Response Request: Acupuncture/Dry Needling

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Print Your Name (required): Marta Tesdall Signature: Marta Tesdall

City/State/Zip code: Ames, IA 50010

Public Response Request:

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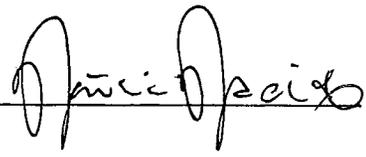
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Print Your Name (required): MARCIA ALMEIDA DE MACEDO Signature: 

City/State/Zip code: AMES / IA / 50014

OCT 23 2015

Public Response Request:

Acupuncture/Dry Needling

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Print Your Name (required): Mattie Bruning Signature: Mattie Bruning

City/State/Zip code: Ames, IA 50014

OCT 23 2015

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Please use the space below to further explain your opinion (more space on the back):

Your Name (required): Karen A. Ross Karen A. Ross
Ames, IA 50010

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Public Response Request:

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Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Patricia J Bowen

Public Response Request:

OCT 23 2015

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Jonathan M. Bauer

Public Response Request:

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Your Name: Deborah Singleton

Public Response Request:

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Your Name: Jordan M DeCraat Jordan M DeCraat

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Your Name:  Justin P. Clausen, Iowa City, 52240

Public Response Request:

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Please check any and all boxes for who you think should be able to use acupuncture needles:

Yes No

- Licensed Acupuncturists, 2500+ hours of training, Nationally Accredited Graduate Degrees.
- Doctors of Chiropractic, 100 hours of non-accredited, certified training.
- Physical Therapists, minimum 24 hours of training in Dry Needling.
- Athletic Trainers, minimum 24 hours of training in Dry Needling.
- Medical Doctors, with 0 to 300 hours of training.

Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: _____

Alice Clausen
Alice Clausen

Acupuncture/dry needling is an invasive procedure that can do great good in the hands of a well trained practitioner. Without training patients are at risk for injury ^{proper} or poor results.

Public Response Request:

OCT 23 2015

Dry Needling

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Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Kaylyn Olson

Public Response Request:

Dry Needling

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Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name:

Joyce A Beck

Public Response Request:

Dry Needling

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Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Bub Seppa

Public Response Request:

OCT 22 2015

Dry Needling

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Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Ann Marie Sannette

OCT 22 2015

Public Response Request:

Dry Needling

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Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Anne S. Waskom

Only Licensed Acupuncturists have had rigorous training
and are required to pass National Board Exams AND take
continuing education credits to extend their licenses.

Public Response Request:

OCT 22 2015

Dry Needling

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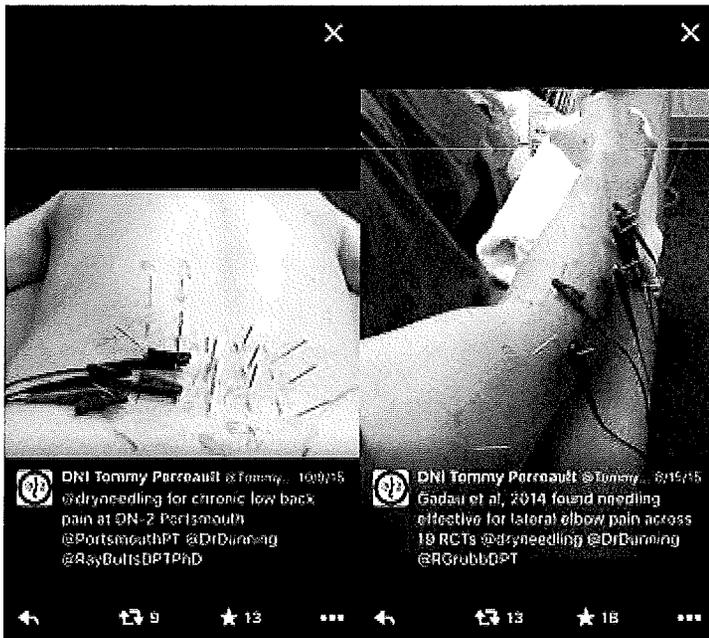
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Please use the space below to further explain you opinion (more space on the back):

Your Name (required): Nona Meyer
NONA MEYER

more on back...



Dry needling is undoubtedly one acupuncture technique that has been used for millennia. Used alone is a very rudimentary approach to the medicine. Used with only a weekend of training and ZERO supervised treatments and you're looking at serious risk for patients in your state. The weekend courses that PTs are taking offer far less than adequate training. If they truly want to help patients, they should learn to use a needle properly, in the method it was intended.

Finally, from my own professional perspective, I am concerned for the future of acupuncture in this country. The appropriation of our techniques by so many other practitioners is surely evidence of their efficacy. It is truly an effective and inexpensive therapy and I see a great future for healthcare in this country as more acupuncture is practiced. I can see that PTs who begin practicing dry needling begin to believe they can practice acupuncture, too. If they do, two things will happen: patients will undoubtedly be injured and it's possible that acupuncture, *not* dry needling, will be blamed; and PTs attempting to practice acupuncture will do so very poorly and the respect for the practice of acupuncture will suffer greatly.

I urge you to consider the above information and to think very clearly about the consequences of adding dry needling to the physical therapy scope. I have more information for you but figure I've taken up enough of your time. If you have any questions, please feel free to contact me.

Thank you,

Ashley Goddard MS, EAMP, L.Ac.
agoddard@ninenneedles.com

Bellingham:
1015 Railroad Ave. #106
Bellingham, WA 98225

(360)734-6463 (NINE)

NOTICE: This document may contain information covered under the Privacy Act, 5 USC 552(a), and/or the Health Insurance Portability and Accountability Act (PL 104-191) and its various implementing regulations and must be protected in accordance with those provisions. You, the recipient, are obligated to maintain it in a safe, secure and confidential manner. Re-disclosure without additional patient consent or as permitted by law is prohibited. Unauthorized re-disclosure or failure to maintain confidentiality subjects you to application of appropriate sanction. If you have received this correspondence in error, please notify the sender at once by calling (360)734-6463 and permanently delete or discard any copies in a manner which maintains confidentiality.

Public Response Request:

Dry Needling

OCT 21 2015

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Yes No

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- Medical Doctors, with 0 to 300 hours of training.

Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Kathleen Giunta

OCT 21 2015

Date:

ATTN: JUDY MANNING
IOWA BOARD OF PHYSICAL AND OCCUPATIONAL THERAPY
321 E. 12TH STREET
DES MOINES IOWA 50319

RE: The practice of "dry needling" by physical therapists and other practitioners not sufficiently trained to practice acupuncture. It is my belief that "dry needling" is actually acupuncture using acupuncture needles and acupuncture points (ashi points)

Dear Ms. Manning and Board Members,

I was dismayed to learn about the movement to certify "dry needling" after only 24 hrs of training. This disturbs me. I expect someone should have far more expertise before they start pricking needles into another person's body. The average aestheticians do far more hours of training to do manicures and waxing. I wouldn't expect less from someone who could do real damage to someone beneath the skin.

Sincerely,

Hiliana Wood

Hiliana Wood
610 Cooper Place #106
Dubuque, IA 52001

OCT 21 2015

Public Response Request:

Acupuncture/Dry Needling

On September 11, 2015, a handful of Iowa licensed acupuncturists attended the Iowa Board of Physical and Occupational Therapy's Meeting. On the agenda was time to discuss whether physical therapists should be allowed to perform an acupuncture technique they call Dry Needling. All of the acupuncturists in attendance spoke against PTs performing this invasive therapy, but physical therapists in attendance argued for the "Dry Needling" acupuncture technique to be allowed. Following this meeting, the Iowa POT Board will allow public input on this matter *only until October 29*. Then they will deliberate and make a final decision in December. The Board published the following statement:

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Mail to: IPOT/Judy Manning, Lucas Building, 321 E. 12th St., Des Moines, IA 50319.

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Please check any and all boxes for who you think should be allowed to use acupuncture needles:

Yes No

- Licensed Acupuncturists, 3,300+ hours of training (including 700-900 hours of supervised clinical internship), Nationally Accredited Graduate Degrees.
- Doctors of Chiropractic, 100 hours of non-accredited, certified training.
- Physical Therapists, minimum 24 hours of training in Dry Needling.
- Athletic Trainers, minimum 24 hours of training in Dry Needling.
- Medical Doctors, with 0 to 300 hours of training.

Please use the back of this page to further explain your opinion.

Print Your Name (required): Jimmy R. Rule Signature: Jimmy R. Rule

City/State/Zip code: West Des Moines, Iowa 50265

Public Response Request:

Acupuncture/Dry Needling

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Please use the back of this page to further explain your opinion.

Print Your Name (required): HELEN E. RULE Signature: Helen E. Rule

City/State/Zip code: West Des Moines IA 50265

OCT 21 2015

Public Response Request:

Dry Needling

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Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Carol Putney

In my opinion, I wouldn't want someone
needling me who wasn't a licensed acupuncturist
just like I wouldn't want someone to fill my tooth
who wasn't a licensed dentist. These professional

people go to school long hours and have the proper training with national accredited Graduate degrees.

Physical Therapist, Athletic Trainers, Chiropractors and Medical Doctors need to stick to their profession and not be allowed to do acupuncture unless they have 2500+ hrs of training and have a Nationally accredited Graduate degree in Acupuncture. It all boils down to inadequate education and safety for all.

OCT 21 2015

Public Response Request:

Dry Needling

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Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your name: Connie Hoehlinger

I only checked one yes as I feel that only licensed acupuncturists should be the only ones to do this procedure!

If you allow the others do this then you are really saying "hey, anyone can do this without the hrs. of training!" This is wrong!!

Public Response Request:

OCT 21 2015

Dry Needling

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Your Name: James I Conlon

Public Response Request:

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Your Name: Maryann Hohnecker

Public Response Request:

OCT 21 2015

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Your Name: Carol Blake

Public Response Request:

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Your Name: Judy Barkhurst

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Dry Needling

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Feel free to use this sheet to record your opinion on this public safety matter, so that your opinion may be submitted to the Board. You may also send letters or emails directly to the Board.

Please check any and all boxes for who you think should be able to use acupuncture needles:

Yes No

- Licensed Acupuncturists, 2500+ hours of training, Nationally Accredited Graduate Degrees.
- Doctors of Chiropractic, 100 hours of non-accredited, certified training.
- Physical Therapists, minimum 24 hours of training in Dry Needling.
- Athletic Trainers, minimum 24 hours of training in Dry Needling.
- Medical Doctors, with 0 to 300 hours of training.

Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: _____

Lucia Long

Public Response Request:

OCT 21 2015

Dry Needling

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Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Judith A. Lehner

Public Response Request:

OCT 21 2015

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Your Name:

Paul Nungesser

Public Response Request:

Dry Needling

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Your Name:

Sharon Longo

OCT 21 2015

Public Response Request:

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Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Robin MacFarlane

I think the more you allow a technique to get "watered-down" by reducing standards, the less effective a technique becomes & potential harmful to the public who is not educated to

understand the differences in education. An ancient art of Chinese medicine can not be learned to any degree of proficiency in 24 - 100 hours of training. ~~②~~ Maintain high standards.

Public Response Request:

OCT 21 2015

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Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Jane M. Christensen

* SAFETY
* BEST CARE

Public Response Request:

OCT 21 2015

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Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

Your Name: Sara A. Ellertson

Manning, Judy [IDPH]

From: Hurm Mark <hurmmark@aol.com>
Sent: Wednesday, October 21, 2015 7:41 AM
To: Manning, Judy [IDPH]
Subject: Acupuncture and dry needling

Judy

There is no disputing the fact that there are numerous differences between the two (I am sure you are aware of them). I am not a practitioner of Acupuncture but a patient.

I have had two very important life changing experiences using Acu.

1. I suffered an injury to my 5th lumbar while going for my 4th degree Black Belt in Tae Kwon Do, the doctors said on a scale of 1-10, I was a 8 for the disc surgery. At 42, I felt I was too young for the surgery and looked elsewhere. During that time; for weeks, I would occasionally use crutches suffered with acute motion restrictions and was in a great deal of pain. I went to a traditional State of Iowa licensed Acupuncturist. The following morning, from my first initial treatment, as I walked out into the kitchen from my bedroom, my kids were amazed that I was 'upright' an not walking **as my daughters would say, like an old man**". I followed up with treatments once a month for about 2 months, and to this day, I now go whenever I feel a twinge of pain.

I went on to get my 5th degree and now at 57 I like to say I'm back to my younger days of no pain, no restrictions to my mobility an no surgery as of yet. If it weren't for the, experience training, studying / 2000 hours of Science, I would of had to have had the surgery.

2. 5 yrs. ago I fell down some stairs and infarcted my kidney. After hospitalization, and numerous tests from a group of doctors at Methodist Hospital here in Des Moines, the doctors said that 1/4 of my right kidney had lost function, and that I would still be able to live a normal life. I explained to my acupuncturist what was going on, and she worked with me over a span of 2 months. A couple of months later at my follow-up with my renal doctor and some additional tests, the doctor was amazed to report that I had regained full function of the kidney. He was unable to explain how it was that I had regained full function of the kidney. Again, I saw first hand what benefits there are to a Licensed Acupuncturist. today when I see an attempt to fast-track what it takes years to learn, it isn't fair to the Acupuncturist, nor to the patients.

Its very simple, would you book a flight with a pilot that has a weekend workshop on flying a plane, or would you book a flight where the pilot has had thousands of hours of experience. the Human body is a miracle of function and design, a crash course on how to insert a needle is only the tip of the iceberg of what it affects systemically.

don't approve dry needling.

thank you for your time and attention, if you have questions please dont hesitate to call.

Mark Hurm
515-971-2996
hurmmark@aol.com

Manning, Judy [IDPH]

From: Cindy McGuire <cindy@handsonsports.com>
Sent: Tuesday, October 20, 2015 2:04 PM
To: Manning, Judy [IDPH]
Subject: Acupuncture and dry needling

Hello Judith,

I'm writing to you out of concern for our state and the wellness of our community.

I was speaking with my acupuncturist about the need for a minimum in hourly training for anyone practicing Dry Needling and Acupuncture. I moved here from Ohio a little over 12 years ago as a sports therapist. When I moved from Ohio, at that time, acupuncture was illegal due to the nature of the treatment and the education required, they just didn't have a regulatory board set in place. It has since been legalized because the State health board set standards for education required in order to make it safe.

I am quite concerned by the number of PT's and Chiropractors that are offering Dry Needling and Acupuncture with very minimal education on the modality. Many of them taking weekend workshops then offering it as a service.

The techniques to do this type of work safely and effectively require much more extensive education. I have worked with Iowa Family Acupuncture and Midwest Acupuncture clinics in the 12 years that I've had my practice in Iowa. In order for the this type of work to be safe, there are very specific techniques that need to be trained.

I work with all the Iowa State University athletes. I found out this morning while working with one of my athletes that a Chiropractor had done dry needling to a muscle that was spasming 3 days prior. With the proper training, an acupuncturist would have known that the group of muscles was too inflamed to do needle work directly in that area. That treatment caused more issues with the athlete's muscle and she has had to take time out of competition due to the muscle group being in too much pain. That is something pretty elementary that could have been avoided.

I personally have had Dry Needling done on several occasions for my neck by Jay at Midwest Acupuncture Clinic. The work that he has done with the dry needling for a very chronic issue I have with my neck, there's no way I would let someone without his level of training even attempt what he does with me. It is very specific and requires great knowledge of the technique.

With Iowa leading the way in many other ways, I believe that not having a greater minimum hourly requirement, will not allow this state to set high standards in health and wellness. With everything having to do with the Healthiest State Initiative, I think that issues such as this should be key components.

I hope that as our state regulations continue to advance that you all will take this into great consideration and set standards that provide the utmost in wellness to patients and clients here in our state.

Iowa Acupuncture and Midwest Acupuncture have done a great job of leading the way in this field here in Iowa. I hope that you will take what they have done and use that to help set those regulations.

Thank you for your time,
Cindy

--

Hands On Sports Massage

Cindy McGuire LMT

3408 Woodland Ave. Suite 203

West Des Moines, IA 50266

515-276-4263

Cindy@handsonsports.com

www.handsonsports.com

<http://handsonsportsmassage.blogspot.com/>

"Our vision is to contribute to the experience and share in the joy of an athlete as they achieve their God given ability."

To ensure the most open schedule for all clients to make appointments, Hands On Sports Massage Requires a minimum of 24 hours notice for missed appointments and cancellations. Failure to meet these requirement will result in a charge for that appointment at the discretion of Hands On Sports Massage. This is intended as a convenience for all.

Manning, Judy [IDPH]

From: Sharon and Dick Schilling <pusanskm@hotmail.com>
Sent: Tuesday, October 20, 2015 7:39 PM
To: Manning, Judy [IDPH]
Subject: [L2SPAM] Licensing of Dry Needling in Iowa

Importance: Low

20 Oct 2015

Dear Ms. Manning,

I am very concerned about the issue of licensing the practice of "dry needling" in Iowa and throughout the USA.

I have been an acupuncture patient for more than 30 years in 5 countries (China, Japan, Korea, Germany and the USA). My acupuncture was administered only by medical doctors or licensed acupuncture practitioners with more than 3,000 hours of formal study. I fully understand the serious injuries that can occur when administered by anyone with less than the full course of study. That's the issue: most people, including our legislators, know next to nothing about acupuncture and, in making the laws regarding acupuncture, have simply responded to the strongest lobby. There are many, many practitioners in multiple states across the USA who skirt the licensing requirements by calling it "dry needling", etc. My friend and neighbor in Fort Dodge, IA was seriously injured in the spring of 2015 by a chiropractor using dry needling. Patients do not understand what serious injuries can occur and they certainly are not being warned. Dry needling practitioners may be legal according to state laws, but they simply do not have the extensive training and experience provided by a Diploma in Acupuncture or Oriental Medicine. **To potential patients of dry needling practitioners, I would say: Just because the practitioner is licensed by your state does NOT mean you are safe. Acupuncture has been practiced for thousands of years; it is very effective medical treatment ~~ in the right hands!**

Iowa is a progressive State, concerned about safety and quality of life for our citizens; let's put a stop to this practice!

Sharon Smith Schilling
1683 13th Ave North

Fort Dodge, IA 50501
pusanskm@hotmail.com

Manning, Judy [IDPH]

From: mail@changemail.org
Sent: Tuesday, October 20, 2015 10:28 AM
To: Manning, Judy [IDPH]
Subject: 100 more people signed "Stop Dry Needling/Acupuncture by Physical Therapists in Iowa"

change.org New signatures

Iowa Board of Physical and Occupational Therapy – This petition addressed to you on Change.org has new activity. See progress and respond to the campaign's supporters.

Stop Dry Needling/Acupuncture by Physical Therapists in Iowa

Petition by IAOMA Acupuncture · 100 supporters



**100 more people signed
in the last 2 days**

[View petition activity](#)

RECENT SUPPORTERS



Julie Betts

Des Moines, IA · Aug 29, 2015

There is no substitute for working with actual experience of the real acupuncturist.



Marcia Brandt

Anamosa, IA · Aug 29, 2015

I only want people who actually attended an accredited acupuncture school to be using needles on me or anyone else.



Byong Yi

Des Moines, IA · Aug 28, 2015

Because I have friends that are highly educated in this field and don't want uneducated persons making them look bad.



Katherine Chuapoco

Des Moines, IA · Aug 28, 2015

As a licensed acupuncturist, I believe in the importance of proper education and training for anyone providing care by using an acupuncture needle. Please support this movement to ensure safe acupuncture and to eliminate dry needling in Iowa.



Shelly Teague

Rockwell City, IA · Aug 28, 2015

I go to an acupuncturist, she does an awesome job with me. She is very informative and knows exactly what she's doing. She also has had training for her position. There is room for acupuncturist, just like drs, dentist, etc. Let them do their jobs just like everyone else does. I will continue going to my acupuncturist even if my Dr takes it up.

[View all 100 supporters](#)

CHANGE.ORG FOR DECISION MAKERS

On Change.org, decision makers like you connect directly with people around the world to resolve issues. Respond to let the people petitioning you know you're listening, say whether you agree with their call to action, or ask them for more information. [Learn more.](#)

This notification was sent to jmanning@idph.state.ia.us, the address listed as the decision maker contact by the petition starter. If this is incorrect, please [post a response](#) to let the petition starter know.

Change.org · 548 Market St #29993, San Francisco, CA 94104-5401, USA

Public Response Request:

Dry Needling

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- Medical Doctors, with 0 to 300 hours of training.

Please use the space below to further explain you opinion (more space on the back):

Your Name (required): Melissa R. Hill

Dear Board members,

I am 40 years old, and have been an acupuncture patient for 10 years. I was referred to a licensed acupuncturist during my 7th month of pregnancy for immediate treatment of preeclampsia. I have returned to my acupuncturist over the years for everything from adrenal fatigue, tendonitis, allergies, colds/flu/immune system support, chronic back pain and severe inflammation from a bulged disc injury years ago, and other varied health issues. I submit this opinion on the practice of "dry needling," calling for utmost focus on standard of care.

more on back...

Your Name: Melissa R. Hill

Just as a medical doctor goes through intense study and rigorous training through clinical observation and internships, so do licensed acupuncturists. Acupuncture is legitimate medicine. "Western," "Eastern," it's all ~~the practice of medicine. There are beneficial indications (and serious contraindications) in western~~ medicine practices, as there are in eastern medicine. One who wishes to practice medicine is fully aware of the amount of work needing completed before becoming a practitioner. Regardless of western or eastern methods, practicing medicine requires specialized, diligent instruction, training, thorough knowledge of the contra/indications, and commitment to continuing education.

Acupuncture is deeply integrative, holistic health care that stands alone in its diagnosis and subsequent treatments. Yet, there is no doubt of acupuncture's benefit as a complimentary treatment to "conventional" treatments. Acupuncture, like conventional practice, carries significant ability to treat any condition with solid, dedicated knowledge and training. That ability carries power that should be wielded to no one who ~~lacks the licensed requirements to use the federally regulated, specialized, professional equipment.~~

No professional board allows non-licensed persons to practice in the field of its organization. A board's ~~prime duty is to protect the public from others who can do harm by practicing in a field wherein they are~~ deficient in education and training. The board and its organization's trustworthiness in reputation and ~~standard of patient care, insist upon professional licensing -- ensuring a practitioner's commitment (and~~ obligation) to master and continue education in the field of study, and to fulfill professional requirements deemed necessary by the licensing board. This is true for attorneys, doctors, dentists, clergy -- all professions ~~requiring licenses.~~

The issue in sum: one cannot practice law if the required coursework, clerkship, and training are not completed, the bar exam is not passed, and licensure is not obtained. A doctor cannot practice medicine without same. An acupuncturist is a type of doctor requiring licensure. Physical therapists are not licensed ~~to practice medicine or use the field's restricted, medical devices. A medical board has ethical violations to~~ contend with if, for instance, a physical therapist began to practice medicine, just as an attorney disciplinary board has ethical violations to contend with if a paralegal began to represent a client in court. The ethical violations in both instances stem from the fact that both the physical therapist and the paralegal do not have the mandated educational training and experience to competently treat the patient or represent the client.

Boards and their regulation of professions exist to protect the public. "Dry needling" is a technique that proposes to loosen practice standards in a profession with established and strictly regulated licensing requirements. Non-acupuncturist medical professionals should not be allowed to treat patients with acupuncture or related techniques without completing the same professional requirements as legitimately ~~trained and licensed acupuncturists.~~

Melissa R. Hill

OCT 19 2015

Public Response Request:

Acupuncture/Dry Needling

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Please use the back of this page to further explain your opinion.

Print Your Name (required): Lila Abrad, Esq. Signature: 

City/State/Zip code: Des Moines, IA 50312

I have experienced a chiropractor using acupuncture needles incorrectly and caused extreme pain and complications. Should not be permitted without the same training as licensed acupuncturists. Thank you.

OCT 19 2015

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Please use the back of this page to further explain your opinion.

Print Your Name (required): CYNTHIA JERRE / Signature: 

City/State/Zip code: AMES, IA 50014

over

considering acupuncture was a "big deal" for me. I spoke with a number of friends & family members from around the country before feeling comfortable enough to set up an acupuncture treatment, and this group of friends included two physical therapists. While many were convinced acupuncture might be helpful, all cautioned me to be certain about the level of training and the attention to sterile needles. I do not feel that I could trust someone with less than full, accredited certification.

Without careful attention to the individuals allowed to practice, consumers/patients would have a hard time ascertaining who is truly a qualified professional. I do not believe it is in the best interest of the patient/client to allow less than fully certified professionals with accredited training to practice acupuncture.

OCT 19 2015

Date: 10-14-15

ATTN: JUDY MANNING
IOWA BOARD OF PHYSICAL AND OCCUPATIONAL THERAPY
321 E. 12TH STREET
DES MOINES IOWA 50319

RE: The practice of "dry needling" by physical therapists and other practitioners not sufficiently trained to practice acupuncture. It is my belief that "dry needling" is actually acupuncture using acupuncture needles and acupuncture points (ashi points)

Dear Ms. Manning and Board Members,

I do not feel that someone who receives a 24 hr. course in acupuncture is qualified to perform acupuncture. Acupuncture should be performed only by a licensed acupuncturist. Why does the governing board for PT & OT therapists feel this is safe? It looks like another way for institutions to make money and also have an easier time with insurance paying for this treatment. Patient safety is the last consideration in this scheme.

Sincerely,

Julie Deutmeys

Manning, Judy [IDPH]

From: mail@changemail.org
Sent: Thursday, October 22, 2015 9:27 PM
To: Manning, Judy [IDPH]
Subject: 100 more people signed "Stop Dry Needling/Acupuncture by Physical Therapists in Iowa"

change.org New signatures

Iowa Board of Physical and Occupational Therapy – This petition addressed to you on Change.org has new activity. See progress and respond to the campaign's supporters.

Stop Dry Needling/Acupuncture by Physical Therapists in Iowa

Petition by IAOMA Acupuncture · 100 supporters



**100 more people signed
in the last 2 days**

[View petition activity](#)

RECENT SUPPORTERS



Julie Betts

Des Moines, IA · Aug 29, 2015

There is no substitute for working with actual experience of the real acupuncturist.



Marcia Brandt

Anamosa, IA · Aug 29, 2015

I only want people who actually attended an accredited acupuncture school to be using needles on me or anyone else.



Byong Yi

Des Moines, IA · Aug 28, 2015

Because I have friends that are highly educated in this field and don't want uneducated persons making them look bad.



Katherine Chuapoco

Des Moines, IA · Aug 28, 2015

As a licensed acupuncturist, I believe in the importance of proper education and training for anyone providing care by using an acupuncture needle. Please support this movement to ensure safe acupuncture and to eliminate dry needling in Iowa.



Shelly Teague

Rockwell City, IA · Aug 28, 2015

I go to an accupuncturist, she does an awesome job with me. She is very informative and knows exactly what she's doing. She also has had training for her position. There is room for accupuncturist, just like drs, dentist,etc. Let them do their jobs just like everyone else does. I will continue going to my accupuncturist even if my Dr takes it up.

[View all 100 supporters](#)

CHANGE.ORG FOR DECISION MAKERS

On Change.org, decision makers like you connect directly with people around the world to resolve issues. Respond to let the people petitioning you know you're listening, say whether you agree with their call to action, or ask them for more information. [Learn more.](#)

This notification was sent to jmanning@idph.state.ia.us, the address listed as the decision maker contact by the petition starter. If this is incorrect, please [post a response](#) to let the petition starter know.

Change.org · 548 Market St #29993, San Francisco, CA 94104-5401, USA

Manning, Judy [IDPH]

From: Colleen Louw <colleen@ispinstitute.com>
Sent: Thursday, October 22, 2015 4:11 PM
To: Manning, Judy [IDPH]
Subject: Dry Needling performed by PT's in IA

Dear Judith:

I have been informed that the Iowa Association of Oriental Medicine and Acupuncture has filed a petition for Declaratory Order to the IPTA regarding dry needling. I believe the emphasis here is that dry needling is not the same as acupuncture. Acupuncture is based off of traditional Chinese medicine philosophies which focuses on meridians, energy flows, herbs, and tongue pulses, to name a few. Dry needling is a mechanical-device assisted treatment in which a filament needle is inserted into a muscle to simply release what is termed a muscle "trigger point" based on pain patterns, and that is the sole reason. Once a "trigger point" is released, not only is pain relieved but the muscle is restored to its normal length and "loosen" shortened muscles so that the muscle can function normally. This fits in perfectly with the scope of physical therapy practice.

I believe that registered physical therapists who have been trained in dry needling and passed safety tests in their training are more than qualified to provide dry needling to patients, and it is well within their scope of practice, which is in agreement with the Federation of State Boards. In their PT training alone, they learn the anatomy of every muscle in the body with its corresponding origins and insertions, the nervous system, the physiology of how a muscle contracts and relaxes, and they are thoroughly trained in the physical examination and assessment of a patient's neuromuscular system.

There is no conflict here, in my opinion. Dry needling and acupuncture are treatments that are only similar in the fact that both use filament needles, but the reasons and techniques are completely different.

With proper proof of training, there should be no reason why dry needling should not be performed by registered physical therapists. Thank you for taking the time to read my email.

Sincerely,

Colleen Louw, PT

Manning, Judy [IDPH]

From: Milo Vukelich <mvukelich@mac.com>
Sent: Thursday, October 22, 2015 3:03 PM
To: Manning, Judy [IDPH]
Subject: Acupuncture by Physical Therapists in Iowa

Ms. Manning -

Please record this contact as being against allowing Physical Therapists and Athletic Trainers to practice acupuncture in Iowa.

As a former counsel to the Wyoming Board of Nursing, I understand the importance of professional regulation in the field of medicine. I have come to appreciate acupuncture as a unique tool for health care practitioners and I believe that there needs to be significant training required before someone can treat another medically. Physical Therapists and Athletic Trainers, with out advanced and specific acupuncture training, simply do not have the skills to practice this ancient, and proven form of medicine. To permit them to start in Iowa without what is currently required of registered acupuncturists is a bad idea, unnecessarily exposing Iowans to all of the risks that are usually found when unskilled, and inadequately trained, people engaged in a practice beyond their capabilities.

Please contact me if I can be of any further assistance.

Milo M. Vukelich
Attorney at Law
9734 Hazelwood Avenue
Johnston, IA 50131
515.480.0697